

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

BENAIHA WILLIAMS,  
INDIVIDUALLY AND AS  
SUCCESSOR IN INTEREST AND  
ANTICIPATED PERSONAL  
REPRESENTATIVE OF THE  
ESTATE OF CATHERINE LUC;  
TAMIKA PANKEY, AN  
INDIVIDUAL; TOMMY  
CUNNINGHAM, AN INDIVIDUAL;  
ZETHAN WILLIAMS, AN  
INDIVIDUAL; AND LATOYA  
WILLIAMS, AN INDIVIDUAL

Plaintiffs,

v.

JOHNSON & JOHNSON, INC.,  
JOHNSON & JOHNSON  
CONSUMER, INC., AND IMERYS  
TALC AMERICA, INC. F/K/A  
LUZENAC AMERICA, INC., AND  
PERSONAL CARE PRODUCTS  
COUNCIL F/K/A COSMETIC,  
TOILETRY, AND FRAGRANCE  
ASSOCIATION,

Defendants.

MDL NO. 16-2738 (FLW) (LHG) JUDGE  
FREDA L. WOLFSON  
MAG. JUDGE LOIS H. GOODMAN

COMPLAINT AND JURY DEMAND  
Civil Action No.: 3:19-cv-00415

DIRECT FILED ACTION

NOTICE OF FILING SHORT FORM COMPLAINT

Plaintiffs hereby give notice that pursuant to Case Management Order No. 3 (Filing of Short Form Complaints) that the Short Form Complaint and Jury Demand was filed in the above-referenced case on January 11, 2019 on behalf of Plaintiffs BeNaiah Williams, Individually and as Successor in Interest and Anticipated Personal Representative of the Estate of Catherine Luc; Tamika Pankey, an Individual; Tommy Cunningham, an Individual; Zethan Williams, an

Individual; and Latoya Williams, an Individual

Dated: January 11, 2019

Respectfully submitted,

/s/ Julie Hatcher Ralph

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 11, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the EM/ECF participants registered to receive services in this MDL.

/s/ Julie Hatcher Ralph

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Julie H. Ralph  
Attorney for Plaintiff